



**BLOCK O'TOOLE & MURPHY, LLP**

A T T O R N E Y S   A T   L A W

One Penn Plaza, Suite 5315  
New York, NY 10119  
Tel: (212) 736-5300 Fax: (212) 971-9840  
[www.blockotoole.com](http://www.blockotoole.com)

**New Jersey Office**  
116 Village Boulevard  
Suite 200  
Princeton, NJ 08540

**Partners**

Jeffrey A. Block  
Daniel P. O'Toole  
Stephen J. Murphy  
S. Joseph Donahue  
David L. Scher  
Scott Occhiogrosso

**Senior Counsel**

Frederick C. Aranki

January 22, 2018

**Associates**

Michael J. Hurwitz  
Christina Mark\*  
Romina Tominovic  
Daniel Seiden

**Of Counsel**

George A. Freitag  
Javier A. Solano  
Ravi Sattiraju  
Edward V. Sapone

United States District Court  
Eastern District of New York  
225 Cadman Plaza E.  
Brooklyn, NY 11201  
Attention: Honorable Nina Gershon

Re: Brown v. Marriott International Inc.  
Civil Case No.: 1:14-cv-5960 (SLT)  
Our File No. 4295

Dear Hon. Gershon:

The parties submit this joint letter to respectfully request a temporary stay of this matter. We are pleased to report that the parties have entered into a fully executed written agreement to resolve all of these claims via private, binding arbitration, which has been scheduled to take place on April 2, 2019. The arbitration is being held before Retired New York State Supreme Court Justice John DiBlasi at the offices of National Arbitration and Mediation ("NAM") in Manhattan.

We therefore respectfully request that Your Honor stay this case, including the pending motion practice, until the date of the arbitration. Immediately following the arbitration, the parties intend to discontinue this action with prejudice. We ask for a stay, rather than outright discontinuance at the time, just in the highly unlikely event that some unforeseen event prevents arbitration from proceedings as currently scheduled. We fully anticipate, however, that this case will require no further litigation and will be discontinued as soon as the arbitration is held.

\*Senior Associate, Appellate and Motion Practice

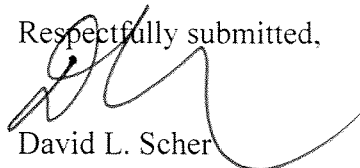


One Penn Plaza  
Suite 5315  
New York, New York 10119

---

Thank you for your time and consideration. We await further instruction from the Court.

Respectfully submitted,



David L. Scher

DLS/ic

Cc: WADE CLARK MULCAHY, LLP  
Attorneys for Defendant(s)  
MARRIOTT INTERNATIONAL INC.  
180 Main Street, 9<sup>th</sup> Floor  
New York, NY 10038